

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT COURT OF ALABAMA
EASTERN DIVISION**

LORI L. FAWBUSH,

Plaintiff,

v.

ALLISON M. LUSARDI, et al.

Defendants.

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* Civil Action No.: CV-3:07-cv-204-WKW

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REPORT OF THE PARTIES' PLANNING MEETING

1. Pursuant to Fed.R.Civ.P. 26(f), the parties submit the plan which has been agreed upon by all parties:

J. Tutt Barrett for plaintiff

Ronald G. Davenport for defendant, Allison M. Lusardi

Randolph Gillum for defendant, Travelers Casualty & Surety Company

2. **Pre-discovery Disclosures.** The parties will exchange the information required by Fed.R.Civ.P. 26 (a)(1) by May 31, 2007.

3. **Discovery Plan.** The parties jointly propose to the court the following discovery plan:

Discovery will be needed on the following subjects: Parties, witnesses and medical providers.

All discovery shall commence in time to be completed by October 8, 2007.

Maximum of 30 interrogatories by each party to any other party.
Responses due 30 days after service.

Maximum of 20 requests for admission by each party to any other party.
Responses due 30 days after service.

Maximum of 7 depositions by plaintiff and 7 by defendants.

Each deposition limited to maximum of 7 hours unless extended by agreement of parties.

Reports from retained experts under Rule 26(a)(2) due:
from plaintiff by July 31, 2007.
from defendants by August 31, 2007.

Supplementations under Rule 26(e) due September 15, 2007.

4. **Other Items.**

The parties **do not request** a conference with the court before entry of the scheduling order.

The parties request a pretrial conference in February, 2008.

Plaintiff should be allowed until August 31, 2007 to join additional parties and until September 15, 2007 to amend the pleadings.

Defendants should be allowed until August 31, 2007 to join additional parties and until September 15, 2007 to amend the pleadings.

All potentially dispositive motions should be filed by November 6, 2007.

Settlement cannot be evaluated prior to May 31, 2007.

Final lists of witnesses and exhibits under Rule 26(a)(3) should be due
from plaintiff by January 28, 2008.
from defendants by January 28, 2008.

Parties should have 7 days after service of final lists of witnesses and exhibits to list objections under Rule 26(a)(3).

The case should be ready for trial by March 10, 2008 and at this time is expected to take approximately two days.

Submitted this 16 May 2007. The undersigned certify that they have secured concurrence from counsel for all parties participating in the planning meeting to submit this report.

/s/ Ronald G. Davenport

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